

# Maryland v. Pringle, 540 U.S. 366 (2003)

Law



Maryland v. Pringle, 540 U. S. 366 (2003) al Affiliation Maryland v. Pringle, 540 U. S. 366 (2003) In this case, Pringle was the defendant while Maryland State was the plaintiff. Pringle confessed owning money and drugs found in Partlow's car. However, Pringle's attempts to deny the confession in the trial court made the jury decide on his arrest for possessing cocaine with the aim of distributing. The plaintiff was Maryland state government where a policeman had arrested a vehicle occupant on the basis of possibly causing crime in a situation that is not very clear who committed it.

### Facts

A speeding vehicle with three occupants, Pringle, Smith, and Partlow, was pulled down police in Baltimore County (Carmen & Walker, 2014). After asking Partlow, the driver, for his registration the police recognized a roll of money in the compartment and sought to perform a consensual search before allowing them to proceed. The police seized \$763 and cocaine stuffed behind the armrest of the back seat. The three acted ignorant of the drugs and money by denying ownership or knowledge of the drugs. This prompted the officers to have all the three arrested, taken to the police station and given a Miranda warning (Carmen & Walker, 2014). However, Pringle relinquished his Miranda rights confessed to own the drugs and money without the knowledge of his friends. Consequently, the trial court sentenced him for possession of cocaine for circulation. However, Pringle claimed that his arrest was illegitimate but was denied motion and had to face ten years of custody without parole. Although, the Court of Special Appeals of Maryland unanimously supported the conviction, the Court of Appeals of Maryland reversed it. The court revealed lack of sufficient evidence to arrest, since even Pringle did not show any sign of previous knowledge, control, or

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authority over the drugs and money.

### Procedural History

Firstly, the officer's arrests did not breach the Fourth Amendment by arresting Pringle on probable cause. However, there was not proof of Pringle's culpability beyond rational doubt. Based on the case *Brinegar v. United States* (1949), warrantless searches should be founded on reasonableness. The arrest was not reasonable given that speeding was the particular reason for pulling the car and not drugs and money. Consequently, a determination of the events leading to the arrest by the court led to the reversal of the decision to convict Pringle for ten years.

### Issues

Does the arrest of Pringle, the passenger in the front seat, present probable cause and a violation of the fourth amendment ban on irrational appropriations and searches in a car driven by its owner?

### Holding

Despite acknowledging that the money was innocuous, and not worth consideration as a determinant of probable cause, the court agreed on the existence of probable cause in facts such as driving at 3: 16 am, the present of high amount of money, cocaine, denial by all occupants in the vehicle of knowledge or possession of the drugs or that money. As a result, it was impossible to link Pringle to ownership of the drugs given that drug dealing never has the owner accepting guilt (Lippman, 2011).

### Reasoning

Carmen & Walker (2014, p. 132) warrantless seizures and arrests are allowed within Maryland law, implying that the officers had the probable cause to believe that Pringle committed owned the drugs. However, there <https://assignbuster.com/maryland-v-pringle-540-us-366-2003/>

was no evidence of probable cause that he owned the drugs since the three could have been aware.

#### Decision

Pringle's arrest was invalid since there was no immediate reason to believe he committed the crime.

#### Comment

This case presents some issues encountered by police officers in an attempt to make vehicle arrests from probable cause.

#### References

Brinegar v. United States, 338 U. S. 160 (Supreme Court June 27, 1949).

Carmen, R., & Walker, J. (2014). Briefs of Leading Cases in Law Enforcement. London: Routledge.

Lippman, M. R. (2011). Criminal procedure. Los Angeles: Sage Publications.